

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TERRAFORM LABS PTE. LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-10070 (BLS)
)
) (Jointly Administered)
)
)
)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER (I) SETTING THE BAR DATE
FOR FILING PROOFS OF CLAIM ON ACCOUNT OF CRYPTO
LOSS CLAIMS, (II) APPROVING THE FORM OF AND MANNER
FOR FILING PROOFS OF CLAIM, (III) APPROVING THE FORM AND
MANNER OF NOTICE THEREOF, AND (IV) APPROVING RELATED PROCEDURES**

PLEASE TAKE NOTICE that on January 31, 2025, the plan administrator (the “Plan Administrator”) of the jointly-administered estates of Terraform Labs Pte. Ltd., *et al.* (collectively, the “Post-Effective Date Debtors” and, prior to the Effective Date, the “Debtors”), and the Wind Down Trust (the “Wind Down Trust”), by and through their undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of the Plan Administrator Seeking Entry of an Order (I) Setting the Bar Date for Filing Proofs of Claim on Account of Crypto Loss Claims, (II) Approving the Form of and Manner for Filing Proofs of Claim, (III) Approving the Form and Manner of Notice Thereof, and (IV) Approving Related Procedures* (the “CLC Bar Date Motion”).

PLEASE TAKE FURTHER NOTICE THAT the Plan Administrator hereby files a revised version of the Proposed Order attached as Exhibit A to the CLC Bar Date Motion

¹ The Post-Effective Date Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Post-Effective Date Debtors’ principal offices are located at 10 Anson Road, #10-10 International Plaza, Singapore 079903. The Plan Administrator of the Post-Effective Date Debtors is Todd R. Snyder. The Plan Administrator’s principal office is located at 1251 Avenue of the Americas, New York, New York 10020.

(the “Revised Proposed Order”), and such Revised Proposed Order is attached hereto as **Exhibit A**. The changes in the Revised Proposed Order provide additional information regarding the claims process.

PLEASE TAKE FURTHER NOTICE THAT a comparison between the proposed order filed as Exhibit A to the CLC Bar Date Motion (the “Proposed Order”) and the Revised Proposed Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE THAT the Plan Administrator intends to present the Revised Proposed Order to the Court at the hearing scheduled for February 26, 2025, at 11:00 a.m. (prevailing Eastern Time) (the “Hearing”) before the Honorable Brendan L. Shannon, United States Bankruptcy Judge, at the Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that the Plan Administrator reserves the right to amend, modify, or supplement the Revised Proposed Order. To the extent that the Plan Administrator makes further revisions to the Revised Proposed Order, the Plan Administrator will file a further revised order with the Court.

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Dated: February 23, 2025
Wilmington, Delaware

/s/ Zachary I. Shapiro

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